

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Dale Wright, Sr., Debtor

Bankruptcy No.: 24-20725-GLT
Chapter 13

Dale Wright, Sr., Debtor

v.

PNC Bank, N.A. and
Ronda L. Winnecour, Chapter 13 Trustee, Respondents

DEBTOR'S OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE

AND NOW, comes Dale Wright, Sr., the Debtor in the above matter, by and through his attorney Michael S. Lazaroff, Esquire, and respectfully presents the following Objection to *Notice of Mortgage Payment Change*, and in support thereof, states as follows:

1. Respondent PNC Bank, N.A. filed a *Notice of Mortgage Payment Change* on July 30, 2025.
2. Said *Notice* states that the mortgage payment is increasing from \$985.90 to \$1,386.43, an increase of \$400.53, or 40.6%.
3. Part 3 of said *Notice* states that the reason for the change is "Daily Simple Interest Accrual for Billing Period."
4. The instructions contained in Part 3 also instruct the Respondent to "Attach a copy of any documents describing the basis for the change, such as repayment plan or loan modification agreement."
5. There were no such documents attached to the *Notice*.
6. Debtor believes, and therefore avers, that such a massive increase in the monthly payment is erroneous, unjustified, unconscionable, and is improper.
7. There is no supporting documentation or justification for such an increase.

WHEREFORE, the Debtor Dale Wright, Sr. respectfully requests this Honorable Court to disallow the Respondent PNC Bank's Notice of Mortgage Payment Change and grant any other relief that the Court deems reasonable and proper.

Respectfully submitted,

/s/ Michael S. Lazaroff

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